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**ATTORNEYS FOR** Defendant  
SANDOVAL FOOD CORPORATION, a California  
corporation d/b/a BROILER EXPRESS

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

RICHARD JOHNSON,

Plaintiff,

vs.

SANDOVAL FOOD CORPORATION, a  
California corporation d/b/a BROILER  
EXPRESS, MAN SUNG MOON, an  
individual, AU JU MOON, an individual; and  
DOES 1-20,

Defendants.

Case No. C 15-4914 EJD

STIPULATION AND [PROPOSED]  
ORDER OF DISMISSAL

The parties, by and through their respective counsel, stipulate to dismissal of this action in its entirety with prejudice pursuant to Fed. R. Civ. P. 41(a)(1). Outside of the terms of the Mutual Settlement Agreement and Release (“Agreement”) to which the parties are signatories, each party is to bear his, her or its own costs and attorneys’ fees. The parties further consent to and request that the Court retain jurisdiction over enforcement of the Agreement. See *Kokkonen v. Guardian Life Ins. Co. of Am.*, 511 U.S. 375 (1994) (empowering district courts to enforce settlement agreements under their inherent supervisory powers).

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1 SO STIPULATED.

2 Dated: June 10, 2016

LAW OFFICE OF KENNETH J. PINTO

3 /s/ *Kenneth J. Pinto*

4 By: \_\_\_\_\_  
5 Kenneth J. Pinto  
6 Attorneys for Plaintiff  
7 Richard Johnson

8 Dated: June 7, 2016

JK LAW FIRM, APC

9 /s/ *Charles Ludd*

10 By: \_\_\_\_\_  
11 Charles Ludd  
12 Attorneys for Defendant  
13 Ju Ah Moon

14 Dated: June 16, 2016

CODDINGTON, HICKS & DANFORTH

15 /s/ *Richard G. Grotch*

16 By: \_\_\_\_\_  
17 Richard G. Grotch(\*)  
18 Attorneys for Defendant  
19 Sandoval Food Corporation, a California  
20 corporation d/b/a Broiler Express

21 (\*) I hereby attest that I have on file all  
22 holographic signatures indicated by a  
23 "conformed" signature (/s/)  
24 within this e-filed document.

25 [PROPOSED] ORDER

26 Pursuant to the stipulation of the parties,

27 IT IS HEREBY ORDERED that this action is dismissed with prejudice pursuant to  
28 Fed. R. Civ. P. 41(a)(1).

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1 IT IS FURTHER ORDERED that the Court shall retain jurisdiction for purposes of  
2 enforcing the Mutual Settlement Agreement and Release should such enforcement be  
3 necessary.

4 SO ORDERED.

5 Dated: June \_\_, 2016

6 \_\_\_\_\_  
7 Honorable Edward J. Davila  
8 United States District Judge  
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